

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	LEROY CLARENCE HOUSE, JR	:	
	Debtor	:	CHAPTER 13
		:	
	JACK N. ZAHAROPOULOS	:	
	STANDING CHAPTER 13 TRUSTEE	:	
	Movant	:	
		:	CASE NO. 1-24-bk-02101
	LEROY CLARENCE HOUSE, JR	:	
	Respondent	:	

TRUSTEE'S OBJECTION TO FIRST AMENDED CHAPTER 13 PLAN

AND NOW, this 11th day of February, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced Debtor(s)' Plan for the following reason(s):

1. Debtor has not demonstrated that all tax returns have been filed as required by §1325(a)(9), specifically, 2020 through 2023 federal returns.

WHEREFORE, Trustee alleges and avers that Debtor(s) Plan cannot be confirmed, and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of Debtor(s) Plan.
- b. Dismiss or convert Debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

BY: /s/Douglas R. Roeder
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 11th day of February 2025, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

CHAD J JULIUS ESQUIRE
LAW OFFICES OF LESLIE D JACOBSON
8150 DERRY STREET
HARRISBURG, PA 17111-5212

/s/Tammy Life
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee